

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

NOTICE OF THE UNITED STATES POSTAL SERVICE
REGARDING MIS-DIRECTED REDIRECTED INTERROGATORY RESPONSES
(UPS/USPS-T20-4-8, 17-18)

The United States Postal Service hereby provides notification that some of the interrogatories of witness Wade (USPS-T-20) that had been redirected to witness Nieto (USPS0T-2) for response should have been redirected to the Postal Service for response. Today, the Postal Service is filing responses to the above-captioned interrogatories, redirected to witness Nieto. We respectfully ask that the attached responses that indicate that they were answered by the Postal Service, be substituted where appropriate. The affected interrogatory numbers are UPS/USPS-T20-5, 7, 8 and 18. Witness Nieto's responses to UPS/USPS-T20-4, 6 and 17 are also attached.

The Postal Service regrets any confusion that this may have caused. The undersigned counsel has contacted counsel for UPS to explain the error.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Rate-making


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October 1, 1997

RESPONSE OF POSTAL SERVICE WITNESS NIETO TO INTERROGATORIES
OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS WADE)

UPS/USPS-T20-5. For the Base Year, what was the total of cubic foot miles (CFM) that moved via Highway Contract Routes (HCR) for:

- (a) First Class Mail;
- (b) Priority Mail;
- (c) Express Mail;
- (d) all other mail (please specify).

Response to UPS/USPS-T20-5.

This information is not available. Please refer to my response to FGFS/USPS-T13-11.

RESPONSE OF POSTAL SERVICE WITNESS NIETO TO INTERROGATORIES
OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS WADE)

UPS/USPS-T20-7. For the Base Year, on segments where both VSD and HCR are available, what was the total of CFM that moved by HCR for:

- (a) First Class Mail;
- (b) Priority Mail;
- (c) Express Mail;
- (d) all other mail (please specify).

Response to UPS/USPS-T20-7.

This information is not available. Please refer to the above response to UPS/USPS-T20-5.

RESPONSE OF POSTAL SERVICE WITNESS NIETO TO INTERROGATORIES
OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS WADE)

UPS/USPS-T20-8. For the Base Year, on segments where both VSD and HCR are available, what percentage of HCR segments are available under:

- (a) intra-SCF contracts;
- (b) inter-SCF contracts;
- (c) intra-BMC contracts;
- (d) inter-BMC contracts;
- (e) all other contracts (please specify).

Response to UPS/USPS-T20-8.

This question is unclear. All contracts are by definition purchased transportation and thus HCR segments.

RESPONSE OF POSTAL SERVICE WITNESS NIETO TO INTERROGATORIES
OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS WADE)

UPS/USPS-T20-18. For the Base Year, what percentage of annual HCR CFM involved an AMC/AMF as either the origin service point or destination service point?

Response to UPS/USPS-T20-18.

This information is not available. Please refer to my response to UPS/USPS-T20-5.

DECLARATION

I, Norma B. Nieto, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Norma B. Nieto

Dated: Oct. 1, 1997

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES
OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS WADE)

UPS/USPS-T20-4. For the Base Year, what was the total of cubic foot miles (CFM) that moved via Vehicle Service Drivers (VSD) for:

- (a) First Class Mail;
- (b) Priority Mail;
- (c) Express Mail;
- (d) all other mail (please specify).

Response to UPS/USPS-T20-4.

This information is not available.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES
OF UNITED PARCEL SERVICE
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UPS/USPS-T20-6. For the Base Year, on segments where both VSD and HCR are available, what was the total of CFM that moved by VSD for:

- (a) First Class Mail;
- (b) Priority Mail;
- (c) Express Mail;
- (d) all other mail (please specify).

Response to UPS/USPS-T20-6.

This information is not available. Please refer to the above response to UPS/USPS-T20-4.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES
OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS WADE)

UPS/USPS-T20-17. For the Base Year, what percentage of annual VSD CFM involved an AMC/AMF as either the origin service point or the destination service point?

Response to UPS/USPS-T20-17.

This information is not available.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Anne B. Reynolds

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October 1, 1997